

**BARRACK, RODOS & BACINE**

SAMUEL M. WARD (216562)

One America Plaza

600 West Broadway, Suite 900

San Diego, CA 92101

Telephone: (619) 230-0800

Facsimile: (619) 230-1874

[sward@barrack.com](mailto:sward@barrack.com)

*Counsel for Lehigh County Employee Pension Board*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

- and -

PACIFIC GAS AND ELECTRIC  
COMPANY,

Debtors.

- ☒ Affects Both Debtors  
☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric  
Company

Case No. 19-30088 (DM) (Lead Case)

Chapter 11

(Jointly Administered)

**JOINDER OF LEHIGH COUNTY  
EMPLOYEE PENSION BOARD TO  
SECURITIES LEAD PLAINTIFF'S  
OBJECTION TO REORGANIZED  
DEBTORS' MOTION TO APPROVE  
SECURITIES ADR AND RELATED  
PROCEDURES FOR RESOLVING  
SUBORDINATED SECURITIES CLAIMS  
[D.I. 9189]**

Lehigh County Employee Pension Board, the holder of a Securities Claim<sup>1</sup> and a creditor in the chapter 11 bankruptcy cases (the “**Chapter 11 Cases**”) of the above-captioned reorganized debtors (the “**Debtors**”, or as reorganized pursuant to the Plan, the “**Reorganized Debtors**”), by and through its undersigned counsel, submits this joinder (“**Joinder**”) to *Securities Lead Plaintiff’s Objection to Reorganized Debtors’ Motion to Approve Securities ADR and Related Procedures for Resolving Subordinated Securities Claims* [Docket No. 9189] (the “**Securities ADR Objection**”), in opposition to *Reorganized Debtors’ Motion to Approve Securities ADR and Related Procedures for Resolving Subordinated Securities Claims* [Docket No. 8964] (the “**Securities ADR Motion**”). In support of this Joinder, Lehigh County Employee Pension Board, respectfully states as follows:

## **JOINDER AND RESERVATION OF RIGHTS**

1. Lehigh County Employee Pension Board is a Securities Claimant and timely filed proofs of claim against the Debtors by the Extended Bar Date (Claim Nos. UBYQN27423 and !H\$IO27423).

2. Lehigh County Employee Pension Board incorporates by reference and hereby joins in all arguments set forth in the Securities ADR Objection.

3. Lehigh County Employee Pension Board reserves its right to supplement this Joinder and further reserves its rights to participate in any hearing to consider the Securities ADR Motion, including its rights to make any arguments and to examine witnesses.

<sup>1</sup> Capitalized terms not defined herein shall have the meaning ascribed to them in the Securities ADR Objection (as defined herein) and the Securities ADR Motion (as defined herein), as applicable.

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**CONCLUSION**

For all of the foregoing reasons, Lehigh County Employee Pension Board respectfully requests that this Court enter an Order denying the Securities ADR Motion and granting such other and further relief as may be just and proper.

Dated: October 6, 2020

**BARRACK, RODOS & BACINE**

By: /s/ Samuel M. Ward  
Samuel M. Ward (216562)  
One America Plaza  
600 West Broadway, Suite 900  
San Diego, CA 92101  
Telephone: (619) 230-0800  
Facsimile: (619) 230-1874  
[sward@barrack.com](mailto:sward@barrack.com)

*Counsel for the Lehigh County Employee  
Pension Board*